

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

RICARDO R. GARCIA, DUANE K. GLOVER,
PAUL E. JACOBSON, GAETANO CALISE,
MYKHAYLO I. HOLOVATYUK, BRIAN
GARCIA, PAUL THOMSON and DAVID
HARTMAN on behalf of themselves and all
others similarly situated,

Plaintiffs,

V.

VOLKSWAGEN GROUP OF AMERICA, INC.)
a/k/a AUDI OF AMERICA, INC.,)
VOLKSWAGEN AKTIENGESELLSCHAFT,)
and AUDI AKTIENGESELLSCHAFT,)

Defendants.

Case No.: 1:19-cv-00331-LO-MSN

[PROPOSED] ORDER
GRANTING PLAINTIFFS’
MOTION TO COMPEL
DEFENDANT VOLKSWAGEN
GROUP OF AMERICA, INC.’S
DISCOVERY RESPONSES AND
DOCUMENT PRODUCTION

This matter is before the Court on the Motion by Plaintiffs Ricardo R. Garcia *et al.* to Compel Defendant Volkswagen Group of America, Inc.’s (“VWGOA’s”) Discovery Responses and Document Production.

Upon due consideration of Plaintiffs' motion and Defendant VWGOA's opposition, and for good cause shown, it is hereby:

ORDERED that Plaintiffs' Motion to Compel is Granted; and it is

FURTHER ORDERED that Defendant VWGOA shall within 30 days of the issuance of this Order perform searches using Plaintiffs' Search Strings 11_5, 17, and 29 and produce to Plaintiffs all documents generated therefrom; and it is

FURTHER ORDERED that Defendant VWGOA shall within 30 days of the issuance of this Order perform searches using the 23 persons or positions identified in Plaintiffs' Motion to Compel and produce to Plaintiffs all documents generated therefrom; and it is

FURTHER ORDERED that Defendant VWGOA shall within 30 days of the issuance of this Order produce to Plaintiffs all settlement agreements it has entered into with putative Class members in this action and all correspondence related thereto; and it is

FURTHER ORDERED that Defendant VWGOA shall within 30 days of the issuance of this Order provide substantive responses to Plaintiff Duane K. Glover's First Set of Interrogatories.

It is **SO ORDERED**.

DATE: _____, 2021
Alexandria, Virginia

Liam O'Grady
United States District Judge